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Attorneys for Plaintiff Angela Torres

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**ANGELA TORRES**, an individual,

Plaintiff,

vs.

**ALIREZA ZAMANIZADEH, a/k/a ALI  
ZAMANI**, an individual; and **ADULT CARE  
SEARCH**, a foreign non-profit corporation,

Defendants.

Case No. 3:17-cv-01270-AC

Clark County Superior Court,  
Case No. 17-2-00426-3

**DECLARATION OF SEAN CURRIE  
GLINKA IN SUPPORT OF RESPONSE  
TO DEFENDANT'S MOTION TO  
COMPEL**

I, Sean Currie Glinka, declare as follows:

1. I am one of the attorneys for the Plaintiff in this matter. I make this Declaration based on personal knowledge and public records. I am competent to testify.

2. On July 10, 2019, this Court ordered the Plaintiff to provide Defendant with the "requested discovery that was propounded when defendant was represented by counsel" on or before August 9, 2019. *See* Dkt. 72.

3. On July 15, 2019, I sent an email to Defendant Ali Zamani at the email address of *ali0719@icloud.com*. I included the responses to the interrogatories and requests for production issued by attorney David Richardson when Defendant was represented by counsel. I further included the responsive documents produced by Mr. Richardson. A true copy of this email is attached as **Exhibit A**.

4. On the same day, I also sent an email to Defendant with the supplementary production that had been sent to him by Mr. Richardson on March 16, 2018. A true copy of this email is attached as **Exhibit B**.

5. Defendant's claim that neither documents nor discovery responses have been provided to him is false.

**I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.**

DATED this 3<sup>rd</sup> day of September, 2021.

/s/ Sean Currie Glinka  
Sean Currie Glinka

**CERTIFICATE OF SERVICE**

I hereby certify that on the date shown below I served the foregoing **DECLARATION IN SUPPORT OF RESPONSE TO DEFENDANT'S MOTION TO COMPEL** on the following person(s):

Alireza Zamanizadeh or  
Ali Zamani  
613 Elderbrook Place  
Portland, Oregon, 97225  
Email: ali0719@icloud.com

Adult Care Search  
c/o Ali Zamani  
613 Elderbrook Place  
Portland, Oregon 97225  
Email: ali0719@icloud.com

**[X]** by **mailing** a copy thereof in a sealed, first-class, postage prepaid envelope, addressed to the last known addresses of the above party, and depositing in the U. S. mail at Portland, Oregon on the date set forth below.

**[X]** by **emailing** a copy thereof to the attorney and his/her last known email address on the date set forth above.

DATED: September 3, 2021

/s/ Nicholas J. Henderson  
Nicholas J. Henderson, OSB # 074027  
Sean Currie Glinka, OSB # 082971  
Motschenbacher & Blattner LLP  
117 SW Taylor Street, Suite 300  
Portland, OR 97204-3029  
Tel: 503-417-0500  
Facsimile: 503-417-0501  
Email: nhenderson@portlaw.com  
Email: sglinka@portlaw.com  
Attorneys for Angela Torres

## Terry Coble

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**From:** Sean Glinka  
**Sent:** Monday, July 15, 2019 12:42 PM  
**To:** 'Ali Zamani'  
**Cc:** Nick Henderson; Mary Perry; Paige Zimmerman; 'David Richardson'  
**Subject:** Torres v. Zamani | Discovery Responses  
**Attachments:** 2018.02.20 Torres Ds RFP1 Ps Response.pdf; 2018.02.20 Torres Ds ROG1 Ps Response.pdf; 2018.02.20 Torres production1 reduced.pdf

Dear Mr. Zamani,

In accordance with Judge Acosta's order from July 10, I have attached to this message, Ms. Torres's response to your interrogatories and requests for production. I have also attached the responsive documents.

Contrary to your representations to the Court at our status conference, I understand from Mr. Richardson that the attached discovery responses were sent to you on February 20, 2018, and supplemental discovery was sent to you on March 16, 2018. The supplemental discovery will be sent by a separate message due to size constraints.

Please note that your misrepresentations will be brought to the attention of your criminal counsel and to the Court at our next status conference.

Kind regards,



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## Terry Coble

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**From:** Sean Glinka  
**Sent:** Monday, July 15, 2019 12:44 PM  
**To:** 'Ali Zamani'  
**Cc:** Nick Henderson; Mary Perry; Paige Zimmerman; 'David Richardson'  
**Subject:** Torres v. Zamani | Supplemental Discovery Responses  
**Attachments:** 2018.03.13 RFP voluntary production (00284874xE9B64).PDF; 2018.03.13 ROG voluntary production (00284873xE9B64).PDF; Index for Supplemental Production (00284872xE9B64).PDF; Torres\_000085 – Torres\_000234.pdf

Mr. Zamani,

As stated in my prior message, I've attached the supplemental discovery that was produced to you in March of 2018.

If you are unable to access the attached documents, please let us know.

Kind regards,



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